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CHUNGHWA PICTURE TUBES, LTD. and
CHUNGHWA PICTURE TUBES (MALAYSIA)
SDN. BHD.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-CV-5944 SC
MDL No. 1917

This Document Relates To:

*ViewSonic Corporation v. Chunghwa Picture
Tubes, Ltd., et al.*, No. 3:14-cv-02510-SC

**DECLARATION OF RAY FEKRINIA IN
SUPPORT OF DEFENDANTS
CHUNGHWA PICTURE TUBES, LTD.
AND CHUNGHWA PICTURE TUBES
(MALAYSIA) SDN. BHD.'S MOTION
FOR PARTIAL SUMMARY JUDGMENT
FOR LACK OF STANDING AS TO
VIEWSONIC CORPORATION**

Date: February 6, 2015
Time: 10:00 a.m.
Judge: Hon. Samuel Conti

1 I, Ray Fekrinia, hereby declare as follows:

2 1. I am Chief Financial Officer at Tatung Company of America, Inc. ("TUS"). I have
3 held that position since 2013. I am also currently holding the position of VP of Administration of
4 TUS.

5 2. I submit this declaration in support of Defendants Chunghwa Picture Tubes, Ltd. and
6 Chunghwa Picture Tubes (Malaysia) Sdn. Bhd.'s Motion for Partial Summary Judgment for Lack of
7 Standing as to ViewSonic Corporation. Unless otherwise indicated, I have personal knowledge of the
8 foregoing and could and would testify to the same if called as a witness in this matter.

9 3. Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia) Sdn. Bhd.
10 (collectively "CPT") have never owned any portion of TUS.

11 4. TUS has always been independently managed by its board of directors and officers.


12 5. Tatung Company ("TCO") and CPT have never been involved in the day-to-day
13 operation of TUS.

14 6. TCO members on TUS's board of directors have never constituted a majority of
15 TUS's six- to seven-member board of directors.

16 7. TUS intends to submit a claim as a member of the direct purchaser class in the *In Re:*
17 *Cathode Ray Tube (CRT) Antitrust Litigation* at such time as the Court permits absent class members
18 to do so.

19 I declare under penalty of perjury that the foregoing is true and correct.

20 Executed this 14 day of November, 2014, at Long Beach, California.

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23 Ray Fekrinia
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